

#### 4. Coin Rating and other Coin Line Issues

63. APCC and Great Lakes argue that Ameritech's coin line service is discriminatory because it does not permit PSPs using that service to select their own call rating, operator services or other services. Although this argument raises some issues relating to unbundling, we believe that it is sufficiently distinct to warrant a separate discussion.

64. APCC and Great Lakes contend that, in order to meet the Commission's CEI requirements, Ameritech must provide a coin line service that offers the same options to unaffiliated PSPs as those made available to Ameritech's payphone division.<sup>144</sup> Specifically, they argue that Ameritech's Coin Line service is discriminatory because it permits Ameritech's payphone division to set the end-user rate for intraLATA sent-paid calls,<sup>145</sup> and to select Ameritech as the intraLATA presubscribed operator service provider (OSP).<sup>146</sup> Great Lakes and APCC argue that Ameritech cannot claim that it is infeasible to allow Coin Line service subscribers to select the rate for sent-paid intraLATA calls and to select the presubscribed OSP, because Ameritech currently offers such capabilities through its Profitmaster service in Illinois.<sup>147</sup> Great Lakes and APCC request the Commission to require Ameritech to refile its plan making clear how it will provide, throughout its region and at nondiscriminatory rates, a coin line service that enables PSPs to select their own coin rates and OSP.<sup>148</sup>

65. Great Lakes contends that Ameritech's payphone division has made the following additional selections for Ameritech's Coin Line service: whether to block access to 900 and 976 enhanced service providers, which calls may be blocked at the central office, and which carrier (i.e., Ameritech) will be the intraLATA directory assistance carrier.<sup>149</sup> In addition, Great Lakes claims that 611 calls made from an Ameritech payphone direct end users to Ameritech's repair and coin refund service, but that Ameritech refuses to accept repair and refund requests from non-Ameritech payphones subscribed to Ameritech's Coin Line service.<sup>150</sup>

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<sup>144</sup> APCC Comments at 9-12; Great Lakes Comments at 15-19.

<sup>145</sup> Great Lakes Comments at 16-17; APCC Comments at 9-10.

<sup>146</sup> APCC Comments at 10-12; Great Lakes Comments at 16.

<sup>147</sup> Great Lakes Comments at 18, APCC Comments at 11.

<sup>148</sup> Great Lakes Comments at 19 (requesting the Commission to mandate that Ameritech provide a coin line service in all states based on the "Profitmaster" offering); APCC Comments at 12.

<sup>149</sup> Great Lakes Comments at 16.

<sup>150</sup> Id.

66. APCC also expresses concern that Ameritech's coin line tariffs provide that "[c]oin sent paid local calls will be controlled by the [PSP]."<sup>151</sup> APCC contends that a requirement that payphone equipment must rate local calls further minimizes the utility of the coin line to independent PSPs.<sup>152</sup> APCC states that it believes that LECs previously rated local calls for coin lines in the central office, rather than in payphone equipment. It argues that Ameritech must be required to disclose whether any of its payphones receive network-based rating for local calls, and, if so, how many. APCC contends such information is necessary to determine the extent of discrimination between Ameritech and independent PSP payphones.<sup>153</sup>

67. Ameritech responds that, in assessing APCC's and Great Lakes's claims, the Commission should consider: (1) that the Commission did not require unbundling of network elements for payphone services beyond the basic transmission services provided to the BOC's own payphone operations;<sup>154</sup> and (2) that the demand by independent PSPs for coin lines, and any unbundled functionality, will be minimal, because most independent PSPs have structured their business based on the use of "smart" payphones.<sup>155</sup> With respect to coin rating, Ameritech represents that independent PSPs using Ameritech's Coin Line service can establish their own rates for local calls, because, even in the case of "dumb" payphones, it is the payphone equipment that determines the amount of coinage sufficient to activate the payphone.<sup>156</sup> Ameritech further represents that, while its coin lines currently permit only one rating schedule for sent-paid calls, that rating schedule is established by state regulation.<sup>157</sup> Ameritech adds that, consistent with the requirements of the Payphone Order, it will entertain requests for additional unbundling of the rating function through the ONA service request process.<sup>158</sup>

68. In response to Great Lakes's claim that Ameritech's payphone division has made various preselections for Ameritech's coin line, Ameritech claims that independent PSPs

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<sup>151</sup> APCC Reply at 2 (quoting Michigan Bell, Tariff M.P.S.C. No. 20R, at 16).

<sup>152</sup> APCC Reply at 2.

<sup>153</sup> APCC Reply at 2-3.

<sup>154</sup> Ameritech Reply at 7-8 (citing Payphone Order at para. 148; Reconsideration Order at para. 165). Ameritech notes that the Commission found that such unbundling was not necessary to provide payphone services and that to unbundle some features would require substantial cost to make switch changes. Id.

<sup>155</sup> Id.

<sup>156</sup> Ameritech Reply at 8.

<sup>157</sup> Ameritech Reply at 9.

<sup>158</sup> Id.

generally do not want access to 900 and 976 numbers from coin lines unblocked, because of the potential for fraud and the difficulty in rating such calls on a sent-paid basis.<sup>159</sup> Ameritech represents that it will, nevertheless, entertain requests to unblock 900 and 976 numbers from coin lines pursuant to the ONA process.<sup>160</sup> Ameritech also acknowledges that it is the presubscribed provider for intraLATA directory assistance calls, but claims that independent PSPs can instruct their end users, by posting signs on payphone equipment, to dial a discrete number to access the directory assistance provider of their choice.<sup>161</sup> In addition, Ameritech represents that, since February 15, 1997, access to repair and coin refund services has been changed so that Ameritech payphone users can no longer access such services by dialing 611. Ameritech represents that users of Ameritech payphones now must call an 800 number for repair and coin refund services, and that placards on Ameritech payphones have been changed accordingly.<sup>162</sup>

69. Finally, Ameritech argues that the Commission should not mandate deployment of "Profitmaster" throughout Ameritech's region as Great Lakes and APCC request, because the feature is available with only certain types of switches.<sup>163</sup> Ameritech represents that, due to current limited demand for the feature, ubiquitous deployment would drive the price for the feature beyond customers' willingness to pay.<sup>164</sup>

70. We find that the Payphone Order did not require the BOCs to provide to independent PSPs an unbundled call rating feature for coin line services.<sup>165</sup> We also find that the Payphone Order did not require the BOCs to offer a coin line service that allows independent PSPs to select which calls may be blocked at the central office, or to select the intraLATA directory assistance provider. On reconsideration of the Payphone Order, in response to a request that the Commission require access to various features and functions,

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<sup>159</sup> Ameritech Reply at 9. Ameritech argues that independent PSPs' preference for having such calls blocked is "demonstrated by the fact 900 and 976 blocking is selected by IPPs when ordering COPT service lines in virtually all cases." Id.

<sup>160</sup> Id.

<sup>161</sup> Id. at 10.

<sup>162</sup> Id. See also April 10 ex parte at 2.

<sup>163</sup> Ameritech Reply at 10.

<sup>164</sup> Id. As noted above, Ameritech has committed to filing a federal tariff for ProfitMaster within 45 days of the April 4, 1997 release of the Clarification Order. April 10 ex parte at 2.

<sup>165</sup> Payphone Order at paras. 146-48; Reconsideration Order at para. 165.

including call rating capabilities,<sup>166</sup> the Commission specifically declined to require further unbundling of payphone services beyond those established in the Payphone Order.<sup>167</sup> In addition, we conclude that Ameritech is not required, at this time, to provide throughout its region a coin line service based on Ameritech's "Profitmaster" offering. Ameritech represents that it has tariffed and made available to independent PSPs the same coin line service that its payphone operations use to provide payphone service.<sup>168</sup> If an independent PSP seeks a different arrangement, it may request such an arrangement through the 120 day ONA process. Moreover, we conclude that Ameritech is not required to disclose how many, if any, of its payphones receive network-based rating for local calls. We find no basis in our CEI requirements or the payphone orders for directing Ameritech to furnish such information. Finally, Ameritech represents that, since February 15, 1997, access to repair and coin refund services has been changed so that Ameritech payphone users can no longer access such services by dialing 611. We find that nothing more is required by the Commission's CEI requirements.

## 5. Tariffing Issues

71. APCC, Great Lakes, and AT&T raise various objections to the content of Ameritech's state tariffs.<sup>169</sup> According to Great Lakes, Ameritech has failed to show that it will cease subsidizing its payphone operations with revenue from nonregulated services.<sup>170</sup> Great Lakes asserts that pursuant to the Payphone Order, Ameritech must provide the Commission and the independent payphone providers with cost information that is sufficient to support the tariffed rates for network access services, in order to ensure compliance with section 276.<sup>171</sup> Ameritech responds that it has tariffed both its coin line and its COCOT service line at the state level.<sup>172</sup> According to Ameritech, "the Commission clearly indicated that there was no requirement to file either the tariffs or the cost support at the federal level."<sup>173</sup> Ameritech represents that those state tariffs have been approved "as reasonable" by

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<sup>166</sup> On reconsideration, the New Jersey Payphone Association requested that the Commission require access to call rating capabilities, answer supervision, call tracking, joint marketing, installation and maintenance, and billing and collection. See Reconsideration Order at para. 155.

<sup>167</sup> Reconsideration Order at para. 165.

<sup>168</sup> Ameritech Reply at 11.

<sup>169</sup> See APCC Comments at 5-8; Great Lakes Coalition at 7-14; APCC Reply at 4; AT&T Reply at 4.

<sup>170</sup> Great Lakes Comments at 7-14.

<sup>171</sup> Great Lakes Comments at 9.

<sup>172</sup> Ameritech Reply at 6.

<sup>173</sup> Id.

the commissions in each of the states in which Ameritech provides basic local exchange service.<sup>174</sup>

72. We conclude that the state payphone tariff proceedings are the appropriate fora to address complaints concerning rates, terms and conditions offered in state tariffs. The Commission stated in the Reconsideration Order that it would "rely on the states to ensure that the basic payphone line is tariffed by the LECs in accordance with the requirements of section 276."<sup>175</sup> That order required that the tariffs for these LEC services must be: (1) cost based; (2) consistent with the requirements of section 276 with regard, for example, to the removal of subsidies from exchange and exchange access services; and (3) nondiscriminatory.<sup>176</sup> In addition, the order established that "[s]tates must apply these requirements and the Computer III guidelines for tariffing such intrastate services."<sup>177</sup> The order further stated that "[w]here LECs have already filed intrastate tariffs for these services, states may, after considering the requirements of this order, the Report and Order, and section 276 conclude: 1) that existing tariffs are consistent with the requirements of the Report and Order as revised herein; and 2) that in such case no further filings are required."<sup>178</sup> Finally, the Commission noted that "[s]tates unable to review these tariffs may require the LECs operating in their state to file these tariffs with the Commission."<sup>179</sup> Thus, the state payphone tariff proceedings are the appropriate fora to address concerns about rates, terms, and conditions offered in state payphone service tariffs.

## 6. Inmate Calling Services Issues

73. The Inmate Calling Service Provider Coalition (ICSPC) and AT&T raise a number of issues related to the provision of inmate calling services (ICS). ICSPC and AT&T contend that Ameritech should be required to identify the network and other support its regulated operations will provide to its payphone operations for the provision of ICS.<sup>180</sup> AT&T asserts that Ameritech should state that it will obtain those functionalities for its own inmate payphones at the same rates and under the same terms and conditions as are available

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<sup>174</sup> Id.

<sup>175</sup> Reconsideration Order at para. 163.

<sup>176</sup> Reconsideration Order at para. 163; see also id. at n.492 (noting that the "new services test required in the Report and Order is described at 47 C.F.R. section 61.49(g)(2)").

<sup>177</sup> Id.

<sup>178</sup> Id.

<sup>179</sup> Id.

<sup>180</sup> ICSPC Comments at 2-3, 9; AT&T Comments at 2; APCC Reply at 4; AT&T Reply at 2-3.

to other PSPs.<sup>181</sup> ICSPC also argues that Ameritech must disclose whether its regulated operations will provide its payphone operations with inmate call processing and call control functions and information for fraud protection and the validation of called numbers.<sup>182</sup> ICSPC contends that such services or information must be provided to other carriers on a nondiscriminatory basis. According to ICSPC, Ameritech's failure to describe its provision of ICS in detail prevents the Commission from determining whether Ameritech has complied with the Commission's nondiscrimination requirements.<sup>183</sup> In addition, ICSPC asserts that Ameritech should be required to disclose whether its payphone operations will be responsible for the cost of ICS calls for which they are unable to collect.<sup>184</sup>

74. ICSPC also asserts that Ameritech must show that call processing and call control systems used in its provision of ICS have been deregulated.<sup>185</sup> According to ICSPC, to the extent Ameritech's call processing and call control systems dedicated to ICS are located in Ameritech's central offices, Ameritech must provide physical or virtual collocation to other providers.<sup>186</sup> ICSPC also contends that Ameritech must disclose information on interfaces between Ameritech's equipment dedicated to ICS and its regulated operations.<sup>187</sup>

75. In a subsequent *ex parte* filing,<sup>188</sup> ICSPC argues that section 276 requires the BOCs to treat collect call processing for ICS as part of their nonregulated ICS operations because collect calling is fundamental to ICS.<sup>189</sup> According to ICSPC, if a BOC's ICS operation "hands off" collect calls to its network-based operator services division for processing and that division assumes the responsibility and risk associated with billing and collecting for those calls, then the BOC is essentially providing ICS as a regulated service and is still subsidizing that service contrary to the prohibition in section 276.<sup>190</sup>

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<sup>181</sup> AT&T Comments at 2-3.

<sup>182</sup> ICSPC Comments at 5-9, 10-11, 12-14.

<sup>183</sup> *Id.* at 2.

<sup>184</sup> *Id.* at 14-15.

<sup>185</sup> *Id.* at 7-9.

<sup>186</sup> *Id.* at 9.

<sup>187</sup> *Id.* at 9-10.

<sup>188</sup> See Letter from Albert H. Kramer and Robert F. Aldrich, attorneys for ICSPS, to William F. Caton, Acting Secretary, Federal Communications Commission, (Mar. 19, 1997).

<sup>189</sup> *Id.* at 1-2.

<sup>190</sup> *Id.* at 2.

76. In response, Ameritech represents that it did not specifically mention inmate calling services in its CEI plan because it is treating those operations "consistently with its treatment of all other affiliated payphone service operations."<sup>191</sup> Ameritech further represents that all payphone equipment, including call control equipment uniquely associated with inmate calling services that provides timing, PIN, and other call control functions, is being treated as deregulated.<sup>192</sup> Ameritech further avers that the interface between its regulated operations and the payphone equipment and the services provided by that equipment is the same interface that is available to any other PSP.<sup>193</sup> According to Ameritech, the call control equipment is not collocated in any Ameritech central offices, except for a few offices in Indiana.<sup>194</sup> Ameritech represents that the equipment in these offices will be removed by February 15, 1997.<sup>195</sup>

77. With respect to fraud control and validation, Ameritech represents that there are no network based functionalities that are uniquely available to Ameritech's payphone operations, inmate or otherwise.<sup>196</sup> According to Ameritech, when a call is handed off from Ameritech's pay telephones to Ameritech's operator services system, the call is handled as a regulated one, and is handled in the same manner as any other call handed off to Ameritech's operator services system.<sup>197</sup> Ameritech avers that the regulated operator service system has available to it the same types of fraud control information available to other carriers via a LIDB query.<sup>198</sup> Ameritech represents that because this activity is treated as part of its regulated operations, neither its affiliated pay telephone operations nor any independent PSP's operations are charged for validation or LIDB queries associated with those calls.<sup>199</sup> According to Ameritech, the only unique aspect of calls originating in the inmate context is the screening code associated with those lines. Ameritech states that coin lines or COCOT service lines used in the inmate context, whether purchased by independent PSPs or used by Ameritech's payphone operations will, if the PSP desires, have associated with them a

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<sup>191</sup> Ameritech Reply at 3.

<sup>192</sup> Id.

<sup>193</sup> Id.

<sup>194</sup> Id. at 3-4.

<sup>195</sup> Id. at 4.

<sup>196</sup> Id.

<sup>197</sup> Id.

<sup>198</sup> Id.

<sup>199</sup> Id.

screening code that will alert the operator services system that calls originating on those lines should be handled on a "collect only" basis.<sup>200</sup>

78. Section 276 specifically defines payphone service to include the provision of inmate telephone service in correctional institutions.<sup>201</sup> In the Reconsideration Order, we clarified that the requirements of the Payphone Order apply to inmate payphones that were deregulated in an earlier order.<sup>202</sup> Thus, Ameritech is required to reclassify as unregulated assets all of its payphone assets related to its provision of ICS, with the exception of the loops connecting the inmate telephones to the network, the central office "coin service" used to provide the ICS, and the operator service facilities used to support the ICS.<sup>203</sup> In addition, Ameritech is required to offer on a tariffed basis any basic payphone service or network feature used by its payphone operations to provide ICS.<sup>204</sup>

79. We conclude that Ameritech's CEI plan comports with our CEI requirements with respect to its provision of ICS. Ameritech avers that it will treat as deregulated all of its payphone equipment, including any call control equipment uniquely associated with ICS that provides timing, PIN, and other call-control functions.<sup>205</sup> Additionally, Ameritech represents that its payphone operations will use the same access lines with the same features as are available to independent providers of inmate services.<sup>206</sup> Ameritech also has represented that its call control equipment is not collocated at its central offices.<sup>207</sup> We find no support in the Payphone Order or Reconsideration Order for ICSPC's contention that Ameritech must provide collect calling as a nonregulated service when used with inmate payphones:

80. We conclude that the other issues raised by ICSPC related to the provision of ICS either already have been addressed in this Order, or are beyond the scope of this proceeding. We find that there is no requirement in the Commission's rules, and the ICSPC

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<sup>200</sup> Id. at 4-5.

<sup>201</sup> 47 U.S.C. § 276(d).

<sup>202</sup> Reconsideration Order, at para. 131 (citing Petition for Declaratory Ruling by the Inmate Calling Services Providers Task Force, Declaratory Ruling, 11 FCC Rcd 7362, 7373 (rel. Feb. 20, 1996) (Inmate Service Order); Petitions for Waiver and Partial Reconsideration or Stay of Inmate-Only Payphones Declaratory Ruling, Order, 11 FCC Rcd 8013 (Common Carrier Bur. 1996)).

<sup>203</sup> See Payphone Order, at paras. 157, 159.

<sup>204</sup> See Payphone Order, at paras. 146-49; Reconsideration Order, at paras. 162-63.

<sup>205</sup> Ameritech Reply at 3.

<sup>206</sup> April 10 ex parte at 2.

<sup>207</sup> Ameritech Reply at 3-4.



has cited no authority, that obligates Ameritech to allow the collocation of nonaffiliated providers' call processing and call control equipment in a central office. Furthermore, as noted below, the issue of the treatment of uncollectibles will be addressed in the review of Ameritech's CAM. Finally, with regard to the disclosure of interface information, we have already concluded that Ameritech's CEI plan comports with the Commission's network information disclosure requirements.

## 7. Uncollectibles

81. AT&T and APCC assert that Ameritech must explain its treatment of uncollectibles due to fraud.<sup>208</sup> AT&T contends that, to the extent Ameritech establishes a policy of foregoing uncollectibles due to fraud for its payphone service affiliates, the same treatment must be accorded to non-affiliates.<sup>209</sup> According to APCC, Ameritech must specify and apply a nondiscriminatory policy to its own payphone operations and independent PSPs regarding the collection of charges for Ameritech's services that are fraudulently accessed from payphones.<sup>210</sup> In addition, APCC contends that Ameritech should clarify whether its tariff provisions limiting Ameritech's liability to ICS will limit the liability of Ameritech's payphone operation for fraudulent calls carried by IXCs to or from Ameritech's payphones.<sup>211</sup> If so, APCC claims that the same limitation of liability should apply to independent PSPs that use Ameritech's local exchange service.<sup>212</sup> We find that, while the Payphone Order generally requires that fraud protection must be available on a nondiscriminatory basis, it does not establish any specific requirements for uncollectibles. Because the issue of the treatment of uncollectibles appears to raise principally accounting matters, that issue will be addressed in the review of Ameritech's CAM.

## 8. Message Delivery Service

82. AT&T argues that Ameritech should clarify the status of its Message Delivery Service (MDS) for payphones. As described by AT&T, this "service permits a person who encounters a busy or no answer condition when placing a call from a payphone to record and send a message at a later time to the called party."<sup>213</sup> AT&T contends that there is some confusion about when or whether Ameritech will conduct a trial of this service, and that

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<sup>208</sup> AT&T Comments at 7; APCC Reply at 4-5.

<sup>209</sup> AT&T Comments at 7.

<sup>210</sup> APCC Reply at 4-5.

<sup>211</sup> Id.

<sup>212</sup> Id.

<sup>213</sup> AT&T Comments at 6.

Ameritech's plan must include information about how Ameritech will offer this service.<sup>214</sup> Ameritech responds that it has decided not to pursue offering this service for business reasons.<sup>215</sup> Ameritech argues that, because it is not offering the service, no CEI requirements apply in connection with that service. Based on Ameritech's representation that it no longer intends to offer MDS, we find that Ameritech has sufficiently responded to AT&T's concerns. Should Ameritech decide to begin providing this service, it must comply with applicable CEI requirements.

### 9. Answer Supervision/Signaling Tones

83. Great Lakes claims that the COPTs service offered by Ameritech is discriminatory, because: (1) Ameritech does not offer line side answer supervision to all subscribers of Ameritech's COPTs service, and (2) the answer supervision that is offered to such subscribers is inferior to that provided to Ameritech through the IPP coin line.<sup>216</sup> Great Lakes further argues that the problems with Ameritech's answer supervision are exacerbated by Ameritech's ceasing, in some states, to send signaling ("SIT") tones, which can, to some extent, be used by a "smart" payphone to perform the same type of function as answer supervision, prior to all of its error messages.<sup>217</sup> Great Lakes and APCC contend that Ameritech must be required to offer unbundled, functional answer supervision to all subscribers from all central offices.<sup>218</sup>

84. Ameritech responds that line-side answer supervision is available in all central offices where there is sufficient demand for the service.<sup>219</sup> Ameritech commits that it will

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<sup>214</sup> Id. at 6-7.

<sup>215</sup> Ameritech Reply Comments at 13-14.

<sup>216</sup> Great Lakes Comments at 20-21. Great Lakes claims, for example, that the answer supervision made available to subscribers of Ameritech's COPTs service works only intermittently. Id. at 20.

<sup>217</sup> Great Lakes Comments at 20. SIT tones indicate that certain error conditions exist, such as that an end user dialed a disconnected number, or used an incorrect dialing pattern. If no SIT tone is transmitted, a "smart" payphones may assume that a sent-paid call has been completed, and deposit coins from the escrow unit. Great Lakes claims this could upset customers whose coins are not returned for uncompleted calls. Great Lakes Comments at 20. See also APCC Comments at 8 n.5 ("Ameritech does not specify whether it will provide call intercept tones ('CIT'). In the absence of true answer supervision, CIT must be provided to IPPs because if CIT do not precede operator voice messaging, the operator voice messaging is likely to be incorrectly treated as a completed call.").

<sup>218</sup> Id. at 21; APCC Comments at 8.

<sup>219</sup> Ameritech Reply at 11 (noting that line-side answer supervision is not available in some central offices, because of the high upfront investment costs associated with providing the service in certain switch types).

continue to make the service available in those areas where demand justifies it.<sup>220</sup> In addition, Ameritech represents that answer supervision is not provided, as such, with IPP Coin Line service. Ameritech claims that some of the functions provided by answer supervision are included in coin supervision, which is an inherent part of Coin Line service functionality, and which is available to all subscribers to Ameritech's IPP Coin Line service.<sup>221</sup> Ameritech also represents that the answer supervision feature that is available in connection with its COPT service is provided in the same manner, regardless of the entity subscribing to the service.<sup>222</sup> Ameritech further represents that it has not eliminated SIT tones, despite complaints about the tones from end users that use hearing aids, but rather provides SIT tones in the same situations and in the same manner that it has always provided such tones.<sup>223</sup> Ameritech argues that the provision of SIT tones is "simply not a CEI plan issue," and that, in any event, it is only required not to discriminate "among purchasers of COPT service lines and among purchasers of IPP coin lines."<sup>224</sup>

85. Ameritech represents that it provides line-side answer supervision to all subscribers of its COPT service in the same manner, regardless of the entity using the service. Ameritech further represents that it provides coin supervision to independent PSPs that subscribe to its IPP coin line service in the same manner that it provides coin supervision to itself. Accordingly, we find that Ameritech is providing line-side answer supervision and coin supervision in a manner consistent with the Commission's CEI requirements. Finally, we find that Ameritech's representation that it has not changed the manner or situations in which it provides SIT tones adequately addresses the concerns expressed by Great Lakes and APCC regarding the availability of such tones.

## V. CONCLUSION

86. We conclude that Ameritech's CEI plan complies with the Computer III requirements. Accordingly, in this Order, we approve Ameritech's CEI plan to offer payphone service, as described herein.

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<sup>220</sup> Id.

<sup>221</sup> Id.

<sup>222</sup> Id. Ameritech acknowledges that, from time to time, it has experienced some difficulty in providing the answer supervision feature, but claims that this is due to different requirements for providing the feature with each different type of switch used by Ameritech, and limited experience by installation personnel in installing the feature. Id. Ameritech claims it has attempted to address this problem through training, and that, once the feature has been successfully installed, it has not experienced technical difficulties. Id.

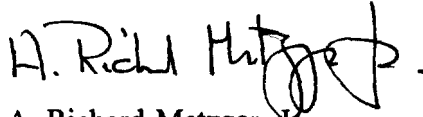
<sup>223</sup> Id. Ameritech April 10 ex parte.

<sup>224</sup> Id. at 12.

**VI. ORDERING CLAUSE**

87. IT IS HEREBY ORDERED that, pursuant to Sections 1, 4(i) and (j), 201, 202, 203, 205, 218, 222, 276 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 154(i) and (j), 201, 202, 203, 205, 218, 222, and 276 and authority delegated thereunder pursuant to Sections 0.91, 0.291 and of the Commission's rules, 47 C.F.R. §§ 0.91 and 0.291 and, Ameritech's Plan to Provide Comparably Efficient Interconnection to Providers of Pay Telephone Services IS APPROVED, subject to the requirements and conditions discussed herein.

Federal Communications Commission

A handwritten signature in black ink, appearing to read "A. Rich Metzger, Jr.", with a stylized flourish at the end.

A. Richard Metzger, Jr.

Deputy Chief, Common Carrier Bureau